

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STACY MERCER, an individual

Plaintiff

vs.

**JERICO HOTELS, LLC, a New York
Corporation,**

Defendants.

Case No. 19-cv-05604-VSB

AFFIDAVIT OF MUKESH PATEL

State of New York)

County of Nassau)

s.s.: Westbury

I, Mukesh Patel as an individual and as the President of Jericho Hotel, LLC, being duly sworn, depose and say:

1. This affidavit is submitted in support of Defendant, Jericho Hotel LLC's (the "Defendant") Motion to Dismiss this action.
2. Defendant owns and operates a hotel named Inn at Jericho located at 101 Jericho Turnpike, Jericho, NY 11753.
3. Defendant also owns and operates a website with the internet address of <http://www.innatjericho.com/>.
4. Prior to the inception of this lawsuit, Defendant had undertaken to comply with the Americans with Disabilities Act (the "ADA") and the ADA Accessibility Guidelines (the "ADAAG"), and before the Complaint was served upon the Defendant, its website was compliant with the ADA and ADAAG standards.

5. After the service of Complaint, I personally reviewed the Complaint and understand all the alleged deficiencies with the Website alleged in the Complaint.

6. I have personally made sure that all such deficiencies alleged in the Complaint have been remedied and that no such barriers to access, as alleged, still exist with <http://www.innatjericho.com/>.

7. Since <http://www.innatjericho.com/> is compliant with the ADA and ADAAG standards, there is no reason for the Defendant to undo the changes that have been made.

8. Defendant is committed to continue to keep its website up to date and compliant with all applicable standards to make the website as accessible to all as possible.

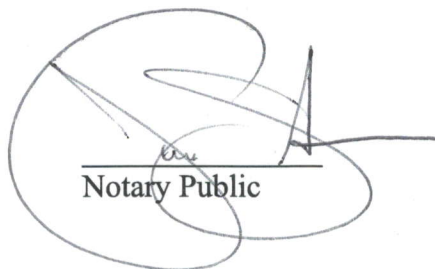
9. Defendant does not intend to let its website fall behind the current standards and will continue to keep the website up to date with any new standards because it does not wish to be involved in any further, unnecessary litigation and because of its commitment to being accessible to as many of its patrons, and as much of the public, as possible.

WHEREFORE, based upon the foregoing, I request for an order dismissing the Complaint against Defendant in its entirety, and for such other and further relief as this Court may deem just and proper.

Dated: August 22, 2019



Mukesh Patel



Notary Public

